

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10581 NMG

YVETTE LOCKHART-BEMBERY, )  
Plaintiff )  
VS. )  
TOWN OF WAYLAND POLICE DEPARTMENT, )  
ROBERT IRVING, in his capacity as CHIEF OF THE )  
WAYLAND POLICE DEPARTMENT and )  
DANIEL SAURO )  
Defendants )

**DEFENDANTS' MOTION FOR APPROVAL TO UTILIZE THE GENERAL GRANT  
OF ACCESS TO C.O.R.I. TO ATTORNEYS OF RECORD**

Now comes the Defendants in the above-entitled case and, acting pursuant to Mass. General Laws, Chapter 6 § 172 (c), requests the approval of this Honorable Court to utilize the general grant of access to C.O.R.I., as provided by the Criminal History System's Board, to attorneys of records for all criminal record information for the following potential witnesses in this case:

- (1) Yvette Lockhart-Bembery, Framingham, Massachusetts
- (2) Adelio DeMiranda
- (3) Andrew Stockwell Alpert
- (4) Darlene McDaniel, Saco, Maine
- (5) Victoria Woodard, Framingham, Massachusetts

Defendants attach an affidavit of counsel in support of this Motion.

Respectfully submitted  
The Defendants  
By their attorneys,

/s/ Jeremy I. Silverfine  
Jeremy I. Silverfine, BBO #542779  
Leonard H. Kesten, BBO #542042  
Brody, Hardoon, Perkins & Kesten, LLP  
One Exeter Plaza  
Boston, MA 02116  
(617) 880-7100

Date: January 5, 2006